

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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Manuel Flores, *on behalf of himself and others*
similarly situated in the proposed FLSA Collective
Action,

Case No.: 22-cv-07770

Plaintiff,

- against -

Omonia Cafe Inc., and Ioannis Arvanitis,

Defendants.
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**NOTICE OF ACCEPTANCE
OF OFFER OF JUDGMENT
PURSUANT TO
FED.R.CIV.P. 68**

WHEREAS, pursuant Rule 68 of the Federal Rules of Civil Procedure (“Fed.R.Civ.P.”), Defendants Omonia Cafe Inc., and Ioannis Arvanitis (collectively, the “Defendants”) (collectively, the “Defendants”), having offered to allow Plaintiff Manuel Flores (together, the “Plaintiff”) to take a judgment against the Defendants in this action in the total sum of Ninety-Five Thousand Dollars and Zero Cents (\$95,000.00) (the “Judgment Amount”), payable as follows:

1. A payment in the amount of Ninety-Five Thousand Dollars and Zero Cents (\$95,000.00) payable via certified check, within ten (10) days after the entry of a final judgment.

WHEREAS, in the event of Defendants’ failure to make any payment when due as set forth above, the breach shall result in accelerated payment of the Judgment Amount together with all costs and attorneys’ fees incurred by Plaintiff in connection with any efforts to enforce any Judgment, less any payments made by Defendants as set forth herein. Defendants acknowledge and agree that this calls for a judgment in a greater amount than the initial judgment amount as a penalty for an uncured default.

WHEREAS, the total Judgment Amount is inclusive of reasonable attorney’s fees, costs, and expenses, for Plaintiff’s claims against Defendants arising out, alleged in, or related to, the

facts and transactions alleged in the above-captioned action (the “Offer of Judgment”).

WHEREAS, a true and correct copy of the Offer of Judgment is annexed hereto as **Exhibit** “A”;

NOTICE IS HEREBY GIVEN that Plaintiff’s counsel hereby confirms acceptance of Defendants’ Offer of Judgment.

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: 

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Attorneys for Plaintiff

Via ECF: All Counsel

Encl.